

EXHIBIT F

EF

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 Civil Action No. 94 Civ. 3976 (LAP)
-----x
5 RONI GILADI,
6 Plaintiff,
7 - against -
8 BERISH STRAUCH, HARRIS STERMAN, DEBRA
9 IRIZARRY, MONTEFIORE MEDICAL CENTER, "JOHN
10 DOE" and "RICHARD DOE," last two names
11 being fictitious, true names being
12 unknown,
13 Defendants.
-----x
14 March 6, 1996
15 11:00 a.m.

16 DEPOSITION of RONI GILADI, taken
17 by the Defendants, pursuant to Court
18 Order, held at the offices of Philip J.
19 Dinhofer, Esq., 370 Seventh Avenue, Suite
20 222, New York, New York, before Debbie
21 Zaromatidis, a Shorthand Reporter and
22 Notary Public of the State of New York.

23 NEWROCK/DeSIMONE
24 ADLER REPORTING SERVICE
25 15 Park Row
New York, New York 10038
(212) 267-6868 (212) 267-3343

1

2 A P P E A R A N C E S :

3

4 PHILIP J. DINHOFFER, ESQ.

5 Attorney for Plaintiff

6 370 Seventh Avenue - Suite 222

7 New York, New York 10001-3900

8

9

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11

12 BARTLETT, McDONOUGH, BASTONE

13 & MONAGHAN, ESQS

14 Attorneys for Defendants

15 One North Lexington Avenue

16 White Plains, New York 10601

17 BY: BETTY ATLAS, ESQ.

18

19

20 ALSO PRESENT:

21 HEIDI LERNER, Law Clerk

22

23

24

25

1

2 R O N I G I L A D I,

3 having first been duly sworn by a Notary

4 Public of the State of New York, was

5 examined and testified as follows:

6 (Defendants' Exhibits A 1

7 through A 3, B, and C 1 and C 2 marked for

8 identification.)

9 MR. DINHOFER: I just want to

10 state for the record that generally I have

11 an objection to the conduct of this

12 proceeding. I am not waiving any

13 objections I have by participating in this

14 proceeding, and I am preserving all rights

15 for appeal by the conduct of this

16 proceeding and all materials discovered as

17 a result of this proceeding.

18 MS. ATLAS: Can you state the

19 nature of your objection in light of the

20 fact that we have a court order?

21 MR. DINHOFER: The court order

22 is wrong.

23 MS. ATLAS: There has been no

24 notice of appeal filed for the court order

25 as far as I am aware. Tell me the nature

1

2 of your objection.

3

MR. DINHOFER: If you are aware
4 of federal procedure, you will know that
5 interlocutory appeals are not permissible,
6 and we have to await the conclusion of the
7 trial. At that point, my position will be
8 stated.

9

MS. ATLAS: I am aware of
10 federal procedure. Thank you, counsel.
11 We will go forward with this deposition,
12 which is pursuant to order of Justice
13 Prescott.

14

We have marked several
15 exhibits. Exhibit A 1, A 2 and A 3 are
16 three pages of notes in Hebrew provided to
17 me this morning by -- these appear to be
18 original notes provided to me by
19 Mr. Dinhofer. A 1 appears to have some
20 writing which apparently bled through the
21 page according to plaintiff's counsel on
22 the back. This appears to also be the
23 case on A 2 and A 3.

24

Exhibit B are copies of pages
25 provided to me by Mr. Dinhofer pursuant to

1
2 court order. They begin with a to whom it
3 may concern letter written by Berish
4 Strauch, one of the defendants in this
5 case. It continues with what appear to be
6 some disability claim forms, another
7 letter by Dr. Strauch, a hospital report,
8 and they then continue with notes and
9 letters written in Hebrew by apparently
10 the plaintiff, commencing in 1991. I just
11 want to count the pages. They appear to
12 be 23 pages of handwritten notes by my
13 count. Next in this group of papers that
14 is being marked as Exhibit B are time
15 sheets from Yeshiva University, three in
16 number, and the last page is blank, and we
17 have also marked as Exhibit C some photos
18 provided by Mr. Dinhofer in this group of
19 papers, and that has been marked as C 1
20 and 2.

21 MR. DINHOFER: I would note that
22 the order of the court for the deposition
23 here today states that plaintiff is to
24 read his notes and be questioned about
25 them. The balance of the materials in

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Exhibit B, which do not comprise plaintiff's notes, are not going to be the subject of any questioning today, and counsel asked me whether or not she could inquire of foundational questions with regard to the photographs, and in the spirit of good faith and cooperation I am permitting her to inquiry solely with regard to the foundational questions on the photographs which were supplied.

MS. ATLAS: I appreciate that.

I did not characterize it as foundational questions, but let's just take it as the questions come.

EXAMINATION BY MS. ATLAS:

Q. Mr. Giladi, my name Betty Atlas. I represent the defendants in this case. I am going to be asking some questions today about some of the materials we marked today and questions coming from that inquiry.

I am going to show you what has been marked as Defendants' Exhibit A 1 through 3. Can you please identify what

1 GILADI

2 these pages consist of?

3 A. Part of my hand note.

4 Q. I am sorry?

5 A. Part of my hand notes that you
6 have a copy of them.

7 MS. ATLAS: Off the record.

8 (Discussion off the record.)

9 MS. ATLAS: Back on the record.

10 Q. Can you look through Exhibit B
11 and see what corresponds to those pages?

12 MR. DINHOFER: Which one is
13 that?

14 A. January 17, 1992.

15 MS. ATLAS: Let's mark that
16 separately.

17 MR. DINHOFER: He is referring
18 to document A 3, and we will tab this one
19 document as B 1.

20 (Defendants' Exhibit B 1 marked
21 for identification.)

22 MR. DINHOFER: Now, do the next
23 one. This one is A 2, and we will mark
24 that B 2.

25 THE WITNESS: I have this one

1 GILADI

2 first.

3 MR. DINHOFER: So what is this?

4 MS. ATLAS: Is that A 1?

5 MR. DINHOFER: So this is A 1.

6 A 1 we will mark B 2.

7 (Defendants' Exhibit B 2 marked
8 for identification.)

9 MR. DINHOFER: And the
10 corresponding page for A 2 will be marked
11 B 3.

12 (Defendants' Exhibit B 3 marked
13 for identification.)

14 MR. DINHOFER: All right.

15 MS. ATLAS: Could I see A 3 for
16 a second. He is going to need this, so
17 you might as well keep it.

18 Q. Looking, Mr. Giladi, at
19 Defendants' Exhibit B 1, which corresponds
20 to your A 3, can you tell me when this
21 note was written?

22 A. Based on the letter, it says
23 January 17, 1992.

24 Q. What were the circumstances
25 under which you wrote this note?

1 GILADI

2 A. I don't understand the
3 question.

4 Q. How did you come to write this
5 note? Were you keeping a general diary of
6 events?

7 A. Whenever I feel that I like to
8 remember something, I would just write
9 down. It is not only with him, with
10 whatever I feel. Just that.

11 Q. Did you write every day?

12 A. Did I write every day?

13 Q. In 1992.

14 A. If it is something that sounds
15 to me not routinely or not -- that make
16 any impression on me that I have to write
17 it, I write it.

18 Q. In January of 1992, where would
19 you have been when you wrote this note
20 physically? Where were you?

21 A. I believe I saw Dr. Strauch
22 in -- I saw Dr. Strauch in the same day,
23 if I am not mistaken.

24 MR. DINHOFFER: The question is
25 where were you when you wrote the note.

1 GILADI

2 A. As I said, maybe after I left
3 his office. Maybe I was waiting for the
4 shuttle from his office to my office,
5 maybe in my office, on my lunchtime. I
6 cannot tell you.

7 Q. Generally, after you finished
8 writing these notes, where would you keep
9 them?

10 A. In my briefcase.

11 Q. Did there ever come a time that
12 you took them out of your briefcase?

13 A. When I got home, I took them out
14 and put them with all my papers.

15 Q. Where was that?

16 A. What do you mean where was
17 that?

18 Q. Was it in a desk? Was it in a
19 drawer?

20 A. No, I have boxes of papers.

21 Q. That was in your home?

22 A. It was in place of -- my place.

23 Q. Do you currently have copies or
24 originals of all of the notes that you
25 kept in 1992?

1 GILADI

2 A. Everything is in Israel at the
3 moment.

4 Q. When was everything taken to
5 Israel?

6 A. It was every time I flew, I took
7 part of it with me.

8 Q. Did there come a time that your
9 attorney asked you to retrieve copies of
10 these notes that were provided to me?

11 A. After my deposition in -- when
12 was it -- in the last deposition, he told
13 me that you were requesting them, so I
14 have to make a special trip to Israel to
15 retrieve it. I asked my family to
16 retrieve it, and they told me they cannot,
17 so I had to go by myself to Israel.

18 Q. That was the only reason you
19 went to Israel at that time, to retrieve
20 the notes?

21 A. If I am going to Israel, I am
22 going to see my family at the same time.
23 I am not going to say to my family I am
24 coming just to see the papers.

25 Q. Did you have any other purpose

1 GILADI

2 other than just retrieving these notes and
3 seeing your family?

4 A. At the same time, I went to see
5 my doctors. If I am spending the money
6 for airfare, I am going for more than just
7 looking for paper.

8 Q. In retrieving these notes, did
9 you go through any other notes kept during
10 the year in 1992?

11 A. I really did not look at
12 anything. I was -- I had limited time
13 that I was there. The only things I
14 looked for, I looked for these notes, and
15 what I found I brought with me, and this
16 is what you have.

17 Q. Were these notes kept in a
18 notebook binder or loose sheets of paper?

19 A. It was in a box, as I said.

20 Q. My question is: Were they kept
21 in a notebook binder together or were they
22 in a looseleaf, things you could take
23 apart?

24 A. Some -- the way you saw that,
25 like that, was together, many pages

1 GILADI

2 together. It depends. Some pages were,
3 and some pages were not. I am not --

4 Q. Looking at what has been marked
5 as Defendants' Exhibit B, there are pages
6 of many notes written in Hebrew from the
7 years 1992, 1991, possibly 1993. I
8 haven't gotten to that yet. Where are the
9 originals of all of these notes, of what
10 has been marked as Defendants' Exhibit B?

11 A. When I looked for the material,
12 I found out that the place where all the
13 stuff was being put, there was a flood
14 there, and there was a leak, and a lot of
15 the stuff was damaged. So I was more
16 concerned to -- I was trying to really to
17 hope that I could find the originals
18 because the copies was not in the same
19 place. So my lawyer told me he wanted
20 originals, not copies, so --

21 Q. There were copies in one place
22 and originals in another?

23 A. I made copies before I hired --
24 before I sent them, before I took them
25 over, and when I took over, I left the

1 GILADI

2 copy and original in Israel. I was upset
3 when I found out, but my brother told me
4 don't be upset. I think I have copies of
5 them some place, so I brought the copies
6 to you, to my lawyer.

7 Q. When you were in Israel, you
8 made copies of all the originals?

9 A. I made copies of a lot of
10 things.

11 Q. Let me finish the question.
12 When you were in Israel, you made copies
13 of all the original notes that were found,
14 and you brought them back to the States?

15 A. No, I did not say that.

16 Q. I am trying to clarify.

17 A. I said when I found these
18 papers, which one of them being marked as
19 A 1 -- A 3, that all of them damaged. I
20 was upset because I felt that I cannot
21 produce what my lawyer required me to
22 produce, and all my trip to Israel was for
23 nothing, and my brother told me why I am
24 upset, and I just told him why, and he
25 told me that he saw some photocopies

1 GILADI

2 filed. Maybe I can go through that, and I
3 find one of the notes that I have that I
4 brought to my attorney, and I photocopied
5 the notes.

6 Q. When had these notes been
7 photocopied?

8 A. I do not recall.

9 Q. Who photocopied them?

10 A. It could be me. It could be my
11 brother.

12 Q. Do you have any recollection of
13 making photocopies of the original notes
14 before the trip to Israel to retrieve
15 them?

16 A. I made photocopies all my life.
17 I can make photocopy after I finish
18 writing it and go to my office. I go to
19 my office and make photocopy immediately
20 two minutes later.

21 Q. It is a yes-or-no question.

22 A. I said I do not recall.

23 Q. If you don't remember, that is
24 fine.

25 A. You are asking me questions, and

1 GILADI

2 I am explaining.

3 Q. Okay.

4 Where are the photocopies that
5 you and your brother located now? Where
6 are those photocopies?

7 A. Where are these photocopies --
8 it is part of -- I gave to my attorney,
9 and he gave you copies of them.

10 MS. ATLAS: Mr. Dinhofer, you
11 have the photocopies that were retrieved
12 by Mr. Giladi?

13 MR. DINHOFER: I have what my
14 client gave me.

15 MS. ATLAS: Can I see what you
16 have? I would like to have them marked.

17 MR. DINHOFER: You want to mark
18 your file.

19 THE WITNESS: We do not know if
20 we give you the original. We give the
21 judge the original. We give what was
22 here. It is mixed.

23 MR. DINHOFER: Whatever it is,
24 it is what it is. This is what I was
25 given.

1 GILADI

2 THE WITNESS: I think --

3 MR. DINHOFER: I know it is the
4 same thing. The pink tabs are the same
5 thing that you have there. They are
6 identicals of the pages that were marked.

7 MS. ATLAS: All right. I will
8 probably mark them later.

9 Q. When did you retrieve the
10 original pages that were marked here today
11 as A 1 through 3; was that at the same
12 time that you took the photocopies?

13 A. I think I said to you before,
14 and I will repeat my answer. Maybe you do
15 not understand my English.

16 Q. I just want the record to be
17 clear.

18 A. I made that clear to you
19 before.

20 Q. Did you retrieve the original
21 pages that were marked here as Exhibit A
22 at the same time that you retrieved the
23 copies of those pages that you gave to
24 your attorney?

25 A. Your question is more clear

1 GILADI

2 now.

3 Q. Is that correct, was it the same
4 time?

5 A. The same period of time. Not
6 the same day.

7 Q. All right.

8 Turning to what has been marked
9 as Defendants' Exhibit B 1, which
10 corresponds to your A 3, I would like to
11 ask you to read this note into the record,
12 and I would like to ask that you read it
13 verbatim in English. In other words,
14 don't just give your interpretationa of
15 it. Read it word for word in English.

16 A. Okay.

17 Q. Beginning with the date,
18 please.

19 A. 17th of January, 1992. I went
20 back for reevaluation, for medical
21 reevaluation, sorry, with Dr. Strauch.
22 After the examination, after the medical
23 examination, I asked from Dr. Strauch to
24 send me to physical therapy because it is
25 already more than a month since the

1 GILADI

2 surgery, and I am still suffering from
3 pain and electric shock -- electric
4 sensitivity, something with electric. I
5 cannot translate this to English because
6 it is not direct translation to that.

7 MR. DINHOFER: What is the word
8 in Hebrew.

9 A. THE WITNESS: Z-r-m-i-m.

10 MR. DINHOFER: That is just a
11 phonetic spelling of a word he cannot
12 translate.

13 A. And also swelling. I am also
14 suffering from loss of sensation, and
15 maybe I need physical therapy which may
16 help. He refer me to the physical -- to
17 the therapist who located the next door
18 building and said to me that she is his
19 therapist. I went to the physical -- to
20 the therapist, Mrs. Anne Long.

21 Q. Mrs. Who?

22 A. Long, Anne Long. I was at her
23 office a few hours. The only things that
24 she did to through all this hours, she put
25 my hand in a bath of water, the water from

1 GILADI

2 the hose. It was not -- is not hot water,
3 not cold water.

4 Q. Luke warm?

5 A. Yes, from the hose, and after
6 that she give me a three-minute massage on
7 my hand. Through all this hours that I
8 was there, she just tried to -- she was
9 talking about Dr. Strauch, and she told me
10 how good he is, to the point that I felt
11 that I do not want to hear any more about
12 that. Also she tried to got some
13 information about my September 1997
14 injury. I barely said any word about the
15 surgery or my problem that I had before
16 the surgery.

17 At the end, she give me
18 prescription of treatment, exercise that I
19 should do at home. I am trying to drop
20 the translation. She also told me why
21 Dr. Strauch did not report your condition
22 as an occupational disease because -- but
23 I was unable to respond to this question.
24 She didn't -- she did not give me any
25 appointment.

1 GILADI

2 Q. That is the end of that note?

3 A. That's correct.

4 Q. What were the home exercise
5 prescriptions that she gave me?

6 A. To put my hand in the same water
7 she put in there and to do the same thing
8 and to move my hand inside of the water.

9 Q. Did you do them?

10 A. Yes, I did.

11 Q. For how long did you do those
12 home exercises?

13 A. A long time. I cannot tell
14 you.

15 Q. More than a month?

16 A. More than a month.

17 Q. Were you working at this time?

18 A. No. I was not working.

19 Q. That would include any type of
20 freelance work?

21 A. I said I was not working.

22 Q. All right. You testified before
23 that you wrote this note at or around the
24 dates that you saw this therapist?

25 A. That's correct. I wrote in

1 GILADI

2 January.

3 Q. What was the reason you decided
4 to take this note back to Israel rather
5 than leaving it in the United States?

6 A. I took all my stuff to Israel
7 because I have no place here that I can
8 put all my stuff, and I took all my stuff
9 to Israel.

10 Q. You had no place in your
11 apartment or your home to keep this note?

12 A. I said I had a lot of stuff. I
13 pack everything, and I took it out from
14 this country.

15 Q. Can you spell the name of this
16 therapist?

17 A. Long, L-o-n-g.

18 Q. L-o-n-d?

19 A. L-o-n-g I believe and Ann I
20 think is A-n-n.

21 Q. After this date, did you ever
22 see this therapist again?

23 A. As I said, she did not --

24 Q. That is not my question. Did
25 you ever see her again?

1 GILADI

2 A. No, I did not. She didn't tell
3 me to come back.

4 Q. Did you ever contact her to
5 schedule an appointment?

6 A. No, she told me I had to do
7 everything at home, and it would be fine.

8 Q. Did you ever discuss with
9 Dr. Strauch anything that transpired
10 during that visit?

11 A. I really do not recall
12 everything I spoke with him about. We had
13 a lot of conversation, and I did not
14 review my notes that I can tell you what I
15 said and what I did not say. You have
16 everything in front of you.

17 Q. Do you recall what was
18 significant about this visit that
19 compelled you to write this note?

20 A. Yes, sure. Her -- the way she
21 treated me.

22 Q. I am sorry. The what?

23 A. The way she treated me.

24 Q. How did she treat you?

25 A. How? I don't think -- I thought

1 GILADI

2 that I was there for investigation more
3 than for therapy.

4 Q. You felt that she treated you as
5 if she was investigating something?

6 A. Yes.

7 Q. In what sense did you feel that
8 way? Why did you feel that way?

9 A. I -- why? Being there for more
10 than an hour, and the only thing she talk
11 about was Dr. Strauch and about credential
12 and about who he is. Why the patient have
13 to know that?

14 Q. Did you feel it was unusual that
15 she was asking you about your '87
16 surgery?

17 A. That's correct.

18 Q. Why did you feel that this was
19 unusual?

20 A. The questions she asked me and
21 the way she asked me sound to me a little
22 bit curious.

23 Q. What about her questions with
24 respect to the 1987 surgery did you find
25 to be curious?

1 GILADI

2 A. I really do not remember
3 everything now. You asked me why I wrote
4 the paper, the letter or the note. I told
5 you why, my feeling at the time. The
6 question I do not recall.

7 Q. Was there anything about the
8 fact that she was questioning you about
9 the 1987 surgery that you felt was
10 significant?

11 A. Because I felt she is not
12 talking about my condition. At the
13 moment, I had the problem with my elbow,
14 and she discussing about something not
15 relative to what I am there for.

16 Q. Did she put your elbow or your
17 hand in the water?

18 A. She put everything, from my
19 finger up to -- she cannot do this one --

20 Q. Up to the elbow?

21 A. She put all my hand inside of
22 the water.

23 MR. DINHOFER: The arm,
24 indicating the fingers through the elbow.

25 Q. And this was the left hand and

1 GILADI

2 elbow?

3 A. That's correct, and, just to
4 clarify, she did not treat my wrist. She
5 treat only my elbow.

6 Q. But your entire arm was in the
7 water; is that correct?

8 A. To be comfortable for the
9 time -- period of time --

10 Q. It is a yes-or-no question.

11 A. Yes.

12 Q. Thank you.

13 Turning to B 2, which
14 corresponds to A 1, I believe, do you have
15 that?

16 A. Which one, A 1?

17 Q. A 1.

18 A. Okay. January 10, 1992 -- on
19 July 10, 1992 --

20 Q. It says January or July?

21 A. July I said.

22 Q. Continue.

23 THE WITNESS: That is amazing.

24 MR. DINHOFER: She reads better
25 than she let on.

1 GILADI

2 Q. Can you continue reading?

3 MR. DINHOFER: I am surprised
4 that you can read the Hebrew.

5 MS. ATLAS: If you look, it is a
6 different word than this.

7 MR. DINHOFER: How do you know
8 it is July? You told the judge you
9 couldn't read this. You gave an affidavit
10 to the court stating that the document was
11 eligible.

12 MS. ATLAS: I never said that
13 every word in this is eligible, and I
14 think it is clear this is a different word
15 than January. Okay.

16 Q. Mr. Giladi, there is no question
17 to you. Please read the note. There is a
18 question asking you to read the note.

19 A. On July 10, 1992, I was -- I
20 went to Dr. Strauch for a visit. In this
21 visit, I informed him that I still
22 suffering from difficulty using my left
23 hand, and I am losing hope that the
24 condition will improve ever. I feel that
25 my condition is getting worse, and I feel

1 GILADI

2 not improvement, and I request from him to
3 help me. I emphasized to him that usually
4 I do not complain about pain, but this
5 kind of pain that I have today there is
6 something that I never was experienced to,
7 and it is difficult to me to function in
8 my new condition.

9 I continued and told him that
10 the -- the condition or the new condition
11 had affecting the way I perform my work,
12 and my -- and the way I do my household
13 stuff, and if I be in Israel and I will be
14 called to military duty, I will not going
15 to be able to function there. I asked him
16 to tell me the truth, what is happening
17 and why my condition is not improving,
18 just degenerating. I claim -- no, he
19 claim -- sorry. He said or he claimed
20 that I should be patient and to wait to
21 the condition to improve. When I realized
22 that from him I am not going to get any
23 information, I called to the office of
24 Dr. Goodrich, and I made an appointment
25 for a visit. On my medical examination

1 GILADI

2 with Dr. Goodrich, he told me that this
3 kind of surgery should not follow with the
4 kind of pain that you are claiming,
5 especially not requiring treatment with
6 morphine or Demerol.

7 Just to emphasize here, I am
8 talking about the pain I was explaining to
9 him immediately after surgery.

10 Q. Is that in the note or are you
11 just explaining that?

12 A. I am explaining that to you.

13 Q. All right.

14 A. In his opinion, when I wake up
15 from the surgery, with the signs -- is
16 this called signs or symptoms. I really
17 do not know. I do not know direct
18 translation to that in English. I had --
19 they should have returned me to the
20 operating room, opened the wound, and to
21 look what happened to the nerve because
22 the symptoms or the signs, I do not -- as
23 I said, I do not know the word or
24 translation -- in my explanation or my
25 complaint, that I had clearly explained

1 GILADI

2 injury to the nerve. He said that this
3 time he cannot continue to treat me
4 because Dr. Strauch is superior, and,
5 therefore, he asked me to go back to
6 Dr. Strauch and to see if he willing to
7 operate on me again to find out what
8 happened to the nerve.

9 Q. When did you see Dr. Goodrich
10 for that appointment?

11 A. In the period of time between I
12 saw Dr. Strauch and July 30.

13 Q. How long before July 30 did you
14 see him?

15 A. I really do not recall.

16 Q. Was it within that week?

17 A. I said I do not recall.

18 Q. Do you have a copy of any office
19 records or reports written by Dr. Goodrich
20 on that exam?

21 A. You have it.

22 Q. I am asking you if you have a
23 copy of any reports or any records from
24 Dr. Goodrich?

25 A. In my hand, no.

1 GILADI

2 Q. I am not asking in your hand.

3 Do you have it in your possession

4 somewhere, whether it is in Israel,

5 whether it is in the States, in your

6 possession?

7 A. I do not -- no, as I said,

8 whatever I have my lawyer has. The only

9 thing I said before --

10 Q. I am just asking you if you have

11 it.

12 A. I said no.

13 Q. The answer is you do not have

14 it?

15 A. I said I do not know because I

16 don't know what I have in my boxes, and I

17 said to you from the beginning of the

18 conversation.

19 Q. Did you ever obtain a copy of

20 any records from that exam from

21 Dr. Goodrich?

22 A. From that exam?

23 Q. Yes.

24 A. I don't think so. I do not

25 recall.